

Maritime Transportation Security Act (MTSA) of 2002
Self-Crediting Exercises for Vessels

APPLICABILITY

Vessels subject to 33 CFR 104 are required to have COTP approved Vessel Security Plans that include Training, Drills and Exercise requirements that adequately prepare the Vessel, Vessel Security Officer and Crewmembers to respond to those threats the vessel is most likely to encounter.

33 CFR 104.230 mandates exercises must be conducted to test the proficiency of vessel personnel in assigned security duties at all Maritime Security (MARSEC) Levels, the effective implementation of the Vessel Security Plan (VSP) and identify any security related deficiencies needing to be addressed.

Vessel Security Plan holders may satisfy this requirement by voluntary and substantial participation in a U.S. Coast Guard Captain of the Port (COTP) sponsored Area Maritime Security (AMS) Plan exercise when scheduled in their area.

FREQUENCY

33 CFR 104.230(c) prescribes exercises must be conducted at least once each calendar year, with no more than 18 months between exercises.

INITIATING AUTHORITY AND PARTICIPANTS

If no AMS Plan exercise is scheduled by the U.S. Coast Guard COTP for their area within the period that the annual exercise of their VSP is required, vessel owners/operators with approved VSP's must design and execute an exercise of their own or participate in a group exercise under the auspices of another industry, port authority or governmental group.

OBJECTIVES

Exercises must be designed to be vessel specific or part of a cooperative exercise program that exercises applicable facility and vessel security plans or comprehensive port exercises.

The exercise should validate the adequacy of:

- 1) Response to changes in MARSEC Levels;
- 2) Procedures for interfacing with facilities and other vessels;
- 3) Declarations of Security (DoS);
- 4) Communications;
- 5) Security measures for access control;
- 6) Security measures for restricted areas;
- 7) Security measures for handling cargo;
- 8) Security measures for delivery of vessel stores and bunkers;
- 9) Security measures for monitoring; and
- 10) Security incident procedures.

CERTIFICATION

Self-Certification.

EVALUATION

Self-evaluation

RECORDS

Per 33 CFR 104.235, records of exercises must be retained by the Vessel Security Officers (VSO) for U. S. Coast Guard review for a period of two (2) years. The record should include the date the exercise was held, a description of the exercise, a list of participants, and any best practices or lessons learned which may improve the VSP.

CREDIT

Exercises of VSP's under 33 CFR Part 104.230 are self-credited and, therefore, provide broad latitude to plan holders in establishing how they can best test the functional adequacy of their security plan.

Plan holders may take credit for having performed the exercise if all objectives of the exercise are met, the exercise is evaluated, and a proper record is generated. 33 CFR Part 104.230(c)(4) and (5) outlines the minimum requirements for an exercise to meet the intent of the regulation; specifically the exercise must be a full and comprehensive test of the vessels communication ability, notification procedures, elements of coordination, resource availability, and response in the event of an incident.

Plan holders with approved VSP's covering more than one vessel wherein the design and operations are similar as provided in 33 CFR 104.410(d) and (e) are required to conduct one exercise for the total plan with each covered vessel exercising the vessel-specific sections relevant to notification, communication and response to the exercised incident.